

# **Chiswick & Bedford Park Preparatory School**

## **Privacy Notice for Employees**

### **General**

This Notice applies to all employees of Chiswick and Bedford Park Preparatory School ('the School') as well as prospective applicants for roles and proprietors.

The School holds and processes personal data and special category personal (sometimes called sensitive) data about its current, past or prospective staff. This information is normally provided to the School by a prospective member of staff on an application form and is added to by the School over the course of employment. Information about staff and prospective staff is retained and disposed of in accordance with The School's Data Protection Policy.

### **What data do we collect?**

We may collect the following types of personal data about staff (and their family members and 'next of kin', where relevant):

- Contact and communications information, including: - your contact details (including email address), telephone numbers and postal address
- Emergency contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice
- Records of communications and interactions we have had with you
- Information relating to your biography (usually contained in the application form and/or CV)
- Financial information, including: - your bank account number(s), name(s) and sort code(s) (used for paying your salary and processing other payments); - your tax status (including residence status); - information related to pensions and national insurance (including your National Insurance number)
- Work related information, including: - details of your work history and references from your previous employer(s); - your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for the School; details of your professional activities and interests, qualifications (including professional teaching qualifications)
- Photo ID (such as a passport or driving licence)
- Any other information relevant to your employment or other engagement to work for the School.

We may also collect special category personal data where this is necessary for your employment or other engagement to work for us and information about criminal convictions and offences, including:

- Information revealing your racial or ethnic origin (usually anonymously);



- Information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
- Information concerning your sexual orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination); and
- Information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations);

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the School.

### **Why do we process personal data?**

The School needs to process personal data about its staff for a number of administrative purposes:

- Managing HR processes such as recruitment, DBS and other relevant employment checks;
- Payment of salaries and pensions, performance management, and training and development;
- Monitoring equal opportunities;
- Providing communications about School news and events;
- Provision of wellbeing and support services;
- Compliance with legal obligations such as making external/statutory returns.

The School processes special category personal data for a number of administrative purposes:

- Equal opportunities monitoring;
- Managing Human Resources processes such as administering Sick Pay and Sick Leave schemes; Managing absence;
- Administering Maternity Leave;
- Managing a safe environment and ensuring fitness for work;
- Managing obligations under Equal Opportunities legislation.

The legal basis the School uses for holding this information is normally as a result of 'legitimate interest', in other words, the School needs this information in order to effectively manage the School. Some personal data will be held on a contractual basis or as a result of a statutory or legal obligation or to protect your vital interests (medical information, for instance). In these cases, the School is required to hold and process your information in order to perform its duties under its contract with you or in order to fulfil an obligation to a statutory body.

The School will process your information in accordance with Data Protection Law (the General Data Protection Regulations 2018 and the Data Protection Act 2018 and any other applicable law) and its own Data Protection Policy. To comply with Data Protection Law, information about individuals must be collected and used fairly, stored safely and securely,



be adequate, relevant and not excessive, be kept accurate and up to date, held only as long as necessary and not disclosed to any third party unlawfully.

### **How do we use your information within the School?**

Within the School, personal data may be shared between colleagues who legitimately need the information to carry out their duties. A member of staff's name and School email address will appear in The School's internal email directory. This information may also appear on the School's website. Staff photographs are used on the internal display board outside the Headmistress' office. The School may monitor computing use through usernames and logins to ensure adherence to the IT policies.

The School is required to obtain information about past criminal convictions as a condition of employment. The School also undertakes DBS and other pre-employment and continuing checks required by the DfE and the Independent School Standards Regulations. The amount of personal information shared within the School will be no more than is reasonably necessary.

### **How do we share your data with third parties?**

The School may need to share your personal and sensitive personal data with third parties outside the School who are contracted to work on its behalf, for example to pension and payroll providers, insurers or legal consultants. The School may also confirm dates and nature or details of an individual's employment to a prospective employer in a reference.

The School may also have to share your personal data with other third parties outside the School for other purposes with your consent. However, there may be circumstances where information is shared without consent. This will only be if:

- There is a statutory obligation to share the data; for example, making returns to the local authority;
- Track and trace data collection/retention and sharing information for Covid-19 reasons;
- Disclosure of non-special category personal data is required for the performance of a contract;
- Disclosure is necessary to protect your vital interests; for example, in medical emergency situations;
- Disclosure is made to assist with prevention or detection of crime, or the apprehension or prosecution of offenders;
- Disclosure is required by a Court Order;
- Disclosure is necessary to assist the School obtain legal advice.

### **How long is my data kept?**

Your personal data is kept by the School for as long as you remain an employee of the School. After this time, different legal retention schedules apply but most employees' information will be retained for **7 years following the termination of employment**. In addition, for any Safeguarding reasons, the current advice to Schools is that some information is kept indefinitely.



## **Your rights in relation to your data**

You have certain rights with respect to the data held about you by the School. You can make a written request to obtain access to the data held about you by the School, subject to certain exemptions (a Subject Access Request).

If you have a concern about the way we are collecting or using your personal data, we ask that you raise any concerns with the School directly via the School's Liaison Officer, Mrs Crystal Waldmeyer. She will liaise directly with the Data Protection Officer (Turniton). Alternatively, if you believe the School is not acting in accordance with Data Protection Law, you can contact the Information Commissioner's Office directly at <https://ico.org.uk/concerns/>

